

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

Federal Insurance Co. v. al Qaida, 03 CV 06978 (RCC)
Vigilant Insurance Co. v. Kingdom of Saudi Arabia, 03 CV 8591 (RCC)

**AFFIRMATION OF SEAN P. CARTER IN OPPOSITION TO
THE KINGDOM OF SAUDI ARABIA’S MOTION TO DISMISS**

Sean P. Carter, Esq., affirms as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, and a member of the law firm Cozen O’Connor. I submit this Affirmation to transmit to the Court the following documents submitted in opposition to the Motion to Dismiss filed by defendant, the Kingdom of Saudi Arabia.

2. Exhibit 1 of this Affirmation is a true and accurate copy of *The Second Report of the Monitoring Group on Sanctions on Al Qaida, the Taliban, and Individuals And Entities Associated With Them*, published by the United Nations Security Council on December 2, 2003.

3. Exhibit 2 to this Affirmation is a true and accurate copy of a report entitled “*Terrorist Financing, Report of an Independent Task Force Sponsored by the Council on Foreign Relations*,” published by the Council on Foreign Relations in 2002.

4. Exhibit 3 to this Affirmation is a true and accurate copy of an article entitled “*Saudis Reform Charities as Anti-Terror Measure*,” which appeared on CNN.Com on June 2, 2004.

5. Exhibit 4 to this Affirmation is a true and accurate copy of an article entitled “*Former Treasury Official Praises Saudi Action Against Terrorist Financing*,” which appeared on www.usembassy.it on January 23, 2004.

6. Exhibit 5 to this Affirmation is a true and accurate copy of the written testimony of Stephen Emerson and Jonathan Levin before the Senate Committee on Governmental Affairs, July 31, 2003, entitled “*Terrorism Financing: Saudi Arabia, Terrorist Financing and the War on Terror*.”

7. Exhibit 6 to this Affirmation is a true and accurate copy of the report on religious freedoms and abuses in Saudi Arabia, contained in the *International Religious Freedom Report 2004*, published by the United States Department of State, Bureau of Democracy, Human Rights and Labor on September 15, 2004.

8. Exhibit 7 to this Affirmation is a true and accurate copy of the Affidavit of Saud Bin Mohammad Al Roshood, the Director of the Executive Office of the Saudi High Commission for Relief to Bosnia and Herzegovina, previously submitted to this Court in support of the Saudi High Commission’s Motion to Dismiss.

9. Exhibit 8 to this Affirmation is a true and accurate copy of the Declaration of Abdulaziz H. Al Fahad, previously submitted to this Court in support of Prince Sultan bin Abdulaziz al-Saud’s Motion to Dismiss.

10. Exhibit 9 to this Affirmation is a true and accurate copy of an article entitled “*U.S. Eyes Money Trails of Saudi-Backed Charities*,” which appeared on WashingtonPost.Com on August 19, 2004.

11. Exhibit 10 to this Affirmation is a true and accurate copy of the “Islamic Organizations Guide” from [Al Islam.Com](http://AlIslam.Com).

12. Exhibit 11 to this Affirmation is a true and accurate copy of the Affidavit of Khalid Bin Obid Azzahri, previously submitted to this Court in support of Al Haramain Islamic Foundation's Motion to Dismiss the claims asserted against it in Burnett v. Al Baraka Investment and Development Corp., 03 CV 9849 (RCC).

13. Exhibit 12 to this Affirmation is a true and accurate copy of the Reasons for Order of Justice B. Cullen in the Canadian immigration proceeding captioned Minister of Citizenship and Immigration v. Mahmoud Jaballah, Federal Court of Canada, DES-6-99.

14. Exhibit 13 to this Affirmation is a true and accurate copy of the Affidavit of Special Agent Colleen Anderson in Support of Search Warrant, filed with the United States District Court for the District of Oregon.

15. Exhibit 14 to this Affirmation is a compendium of press releases issued by agencies of the U.S. government in relation to the U.S. government's designation of branches of Al Haramain Foundation and Aqeel al Aqeel as sponsors of terrorism.

16. Exhibit 15 to this Affirmation is a true and accurate copy of a page from the website Saudinf.Com, entitled "*Consultative Counsel: Introduction.*"

17. Exhibit 16 to this Affirmation is a true and accurate copy of an article entitled "*Feds: Saudi Charity Funds Terror,*" which appeared on CBS News.Com on September 9, 2004.

Affirmed in Philadelphia, Pennsylvania on October 1, 2004.

/s/
Sean P. Carter